

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND

IN RE: MARC J. PEARLMAN

BK No. 7-04-12257

**OBJECTION TO THE MOTION OF  
CITIBANK, N.A., AS TRUSTEE FOR RELIEF FROM STAY**

1. Debtor lacks sufficient information to form a belief as to the truth of the averments of Paragraph 1.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied.
8. Denied.
9. Denied.
10. Debtor lacks sufficient information to form a belief as to the truth of the averments of Paragraph 10.
11. Denied.
12. Admitted.
13. Admitted.
14. Denied.

**FIRST AFFIRMATIVE DEFENSE**

Movant has adequate protection of its interest in its collateral.

Debtor  
By His Attorneys,

/s/PETER G. BERMAN  
BC #2030  
RASKIN & BERMAN  
116 East Manning Street  
Providence, RI 02906  
(401) 421-1363

**CERTIFICATE OF SERVICE**

I hereby certify that on 03/24/05, I electronically filed the Objection with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically: United States Trustee's Office, [Ustregion01.pr.ecf@usdoj.gov](mailto:Ustregion01.pr.ecf@usdoj.gov), Catherine Eastwood, Esquire, [cve@psh.com](mailto:cve@psh.com), and Charles Pisaturo, Esquire, [cpisaturo@earthlink.net](mailto:cpisaturo@earthlink.net); and I hereby certify that I have mailed by United States Postal Service, postage pre-paid, the document electronically filed with the court to the following non CM/ECF participants: Mr. Marc Pearlman, 6 Ralls Drive, Cranston, RI 02920.

/s/BARBARA DUNNING